



Radio Technical Commission for Maritime Services

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**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

In the Matter of)	
)	
MARITEL, INC., and, MOBEX NETWORK)	FCC 04-171
)	
SERVICES, LLC, Petitions for Rule Making)	WT Docket No. 04-257
)	
to Amend the, Commission's Rules to Provide)	RM-10743
)	
Additional, Flexibility for AMTS and VHF)	
)	
Public Coast, Station Licensees)	
)	September 27, 2004
)	

**COMMENTS OF THE RADIO TECHNICAL COMMISSION FOR MARITIME
SERVICES (RTCM)**

The Radio Technical Commission for Maritime Services (RTCM) respectfully submits these Comments in response to the Notice of Proposed Rulemaking published in the Federal Register on August 10, 2004.

The RTCM is a non-profit organization whose objectives include studying and preparing reports on maritime telecommunications practices, needs and technologies with a view toward improving the efficiency and capabilities of maritime telecommunications services, suggesting ways to keep rules and regulations to the minimum essential for

effective maritime telecommunications and making recommendations on important issues involving maritime telecommunications. RTCM strongly supports rules which preserve the maritime spectrum for maritime uses which promote safety of life and property at sea and on inland waterways, and which align U.S. rules with the international frequency allocations established by the International Telecommunications Union's (ITU) Radio Regulations.

The Commission asks for comments on petitions by MariTel and Mobex which seek additional flexibility for public coast station licensees. In response, the Commission proposes to amend the rules to permit VHF public coast (VPC) and automated maritime telecommunications system (AMTS) licensees to provide private mobile radio service to units on land, in addition to commercial radio services. RTCM respectfully submits the following comments:

RTCM supports the Commission's proposal. It would provide licensees with the flexibility to make full use of their authorized spectrum, while providing maritime users with priority access. By improving the business opportunities for spectrum licensees, the proposal could potentially improve services available to maritime users. It is important, however, to ensure that licensees adopt operational or technical measures which ensure that priority is always given to maritime communications. Licensees should be required to give information to the Commission on how this will be accomplished.

RTCM has no objection to removing the requirement for AMTS private correspondence services to provide interconnection to the public switched network. The market will

dictate whether such interconnection is required. Public correspondence services should retain the interconnection requirement.

In accordance with RTCM's goal of preserving maritime spectrum for maritime uses, RTCM supports the Commission's position to continue to require VPC licensees to provide maritime public correspondence services. The distress and safety services currently provided by and contemplated by the U.S. Coast Guard do not replace public correspondence service.

We agree with the Commission, that AMTS and VPC licensees should continue to be governed by part 80 regulations. These are primarily maritime services and must remain so.

We also support alignment of the maritime VHF spectrum with that of the ITU Radio Regulations with respect to use of the spectrum for port operations and ship movement services, in the interest of promoting compatibility with international shipping and increased flexibility.

For the Radio Technical Commission for Maritime Services

A handwritten signature in black ink, reading "R L Markle". The signature is written in a cursive, flowing style.

R. L. Markle
President